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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO FILE
AMENDED COMPLAINT AND FOR
DEFENDANTS TO FILE REPLY TO
PLAINTIFF’S OPPOSITION TO
DEFENDANTS’ MOTION FOR RULE 11
SANCTIONS**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until April 29, 2022, to file an Amended Complaint in compliance with the Court’s Order filed on March 30, 2022. ECF No. 178. Additionally, the parties agree to permit Defendants, to and until May 20, 2022, to file a reply to Plaintiff’s opposition (ECF No. 183) to Plaintiff’s motion for FRCP 11 sanctions (ECF No. 174).

Presently, Plaintiff is expected to file an Amended Complaint today, April 20, 2022, and Defendant’s are expected to file a reply brief on April 22, 2022. This is the parties first request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties rely upon the following:

1. Counsel for Defendants contacted undersigned counsel Paul S. Padda for the purpose of inquiring about an extension of time for filing a reply to Plaintiff’s opposition to the FRCP 11 motion. Counsel for Plaintiff’s have no opposition to that request or permitting Defendant’s additional time to file a reply brief. Counsel for both parties have busy case schedules and, following communication regarding the matter, believe the requested continuance is appropriate and warranted in order to accommodate work schedules. In return, counsel for Defendants have no issue with an additional 9-days for Plaintiff to file an Amended Complaint.

2. Counsel for both parties respectfully request the Court approve this Stipulation and permit the following:

- a. Plaintiff shall file an Amended Complaint on or before April 29, 2022;
- b. Defendants shall file a reply to Plaintiff’s opposition to the FRCP 11 motion on or before May 20, 2022.

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ Kris Leonhardt

/s/ Paul S. Padda

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Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
6 *Counsel for all named Defendants*

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

7 Dated: April 20, 2022

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9 Dated: April 20, 2022

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11 **IT IS SO ORDERED:**

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14 **UNITED STATES MAGISTRATE JUDGE**

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16 **DATED: April 21, 2022**